

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov**

In re:

**Case No. 6:18-bk-02491-CCJ
Chapter 13**

JAMES ANTHONY VILLANI,

Debtor.

_____ /

**RESPONSE TO MOTION TO DISMISS FOR
FAILURE TO MAINTAIN TIMELY PLAN PAYMENTS**

[Document No. 58]

COMES NOW James Anthony Villani, Debtor, by his undersigned counsel, and in response to the Trustee's Motion to Dismiss for Failure to Maintain Timely Plan Payments [Document No. 58], states as follows:

1. Debtor admits the averments of paragraph 1 of the said Motion.
2. Debtor admits the averments of paragraph 2 of the said Motion.
3. Debtor admits the averments of paragraph 3 of the said Motion.
4. Debtor admits the averments of paragraph 4 of the said Motion; and further answering, Debtor states that he has this date filed a Motion to Amend Confirmed chapter 13 Plan that addresses his delinquent payments.

WHEREFORE, Debtor prays that the Trustee's Motion to Dismiss for Failure to Maintain Timely Plan Payments [Document No. 58] be denied.

Respectfully submitted,

/s/ John T. Snow

John T. Snow, Esq.
Attorney for Debtor
FL Bar #0039685
390 North Orange Ave., Ste. 2300
Orlando, FL 32801
Phone 407-286-6663
johnsnow@cfl.rr.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response has been furnished by United States mail and/or by electronic transmission to the parties listed below on 04/06/2019:

Debtor – James Anthony Villani, 608 Fiorella Ct., DeBary, FL 32713

Trustee - Laurie K. Weatherford, PO Box 3450 Winter Park FL 32790

/s/ John T. Snow

John T. Snow, Esq.

Attorney for Debtor

FL Bar #0039685

390 North Orange Ave., Ste. 2300

Orlando, FL 32801

Phone 407-286-6663

Fax 407-412-5068

johnsnow@cfl.rr.com